United States
Environmental Protection
Agency

Region 10
Washington Operations Office
c/o Washington Department of Ecology, PV-11
Olympia WA 98504

Washington

GECSF
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6/11/91

EPA

June 11, 1991

Reply To
Attn Of: WOO

MEMORANDUM

SUBJECT: General Electric - Spokane

FROM: Bob Kievit

TO: Phil Millam, Chief
Superfund Branch

This is written to make you aware of a problem that has developed at the General Electric NPL site in Spokane. Last October and November General Electric prepared five test cells in which to conduct trial burns of Geosafe's insitu vitrification (ISV) process as part of the RI/FS. In one cell General Electric spiked a layer of soil with nearly 2 drums of transformer oil containing 73% PCBs. The remaining cells contained soils and other PCB contaminated materials already at the GE site. Geosafe was also using the trial burns to support their application for a general TSCA treatment permit from EPA. The permit and demonstration test are being handled by TSCA HQ. The testing was to be conducted in November 1990.

Delays in equipment manufacture and delivery caused the demonstration test to be postponed month by month. A complete ISV unit was finally assembled at Geosafe's facility at Hanford in March. While undergoing pre-testing at Hanford, a fire destroyed a portion of the unit and disclosed design problems that will require significant rework. The demonstration test at General Electric has now been moved back until about November 1991.

General Electric may currently be in violation of certain TSCA requirements for storage of PCB materials and is faced with TSCA's PCB storage limitation of 1 year prior to disposal. EPA Region 10 TSCA has informed General Electric that they face civil and possibly criminal actions ~~for~~ if TSCA requirements are violated. General Electric indicates that if they have to remove and incinerate the spiked soil now, that it will cost approximately $2.7 million and that additional PCB oil will have to be brought on site for spiking purposes when the ISV trial burn is ready to go.

I have asked our TSCA people to let us know if and when they decide to take enforcement action.

Since the site is already grossly contaminated and is adequately fenced, and given the lack of PCB mobility, the spiked soils in the one test cell represent minimal danger to human health and the environment over the sort-term.

Mistakes were made by General Electric and Geosafe to contribute to this situation. Tighter management of site activities by either EPA TSCA Headquarters or by Ecology may have prevented this situation from occurring. I have asked the Ecology site manager to take a stronger role in managing all site activities.